MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal	Plaintiffs' Executive Committee for
Injury and Death Claims	Commercial Claims
Ronald L. Motley (1944-2013)	Stephen A. Cozen, Co-Chair
Jodi Westbrook Flowers, Co-Chair	Sean Carter, Co-Chair
Donald A. Migliori, <i>Co-Chair</i>	J. Scott Tarbutton, Liaison Counsel
Robert T. Haefele, Liaison Counsel	Cozen O'Connor
MOTLEY RICE LLC	

VIA ECF

March 13, 2024

The Honorable Sarah Netburn, U.S. Magistrate Judge United States District Court for the S.D.N.Y. Thurgood Marshall U.S. Courthouse, Room 430 40 Foley Square New York, NY 10007

In Re: Terrorist Attacks on September 11, 2001, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

Re:

Pursuant to this Court's Order regarding the unsealing of judicial records (ECF No. 9634), the Plaintiffs' Executive Committees and counsel for the *Ashton* Plaintiffs ("Plaintiffs") are today filing on the public docket the following two documents:

- Supplemental Declaration of Usman Madha, together with its Exhibits 1 6 (previously filed under seal at ECF No. 9500-4); and
- Declaration of William Adams, together with its Annexes 1 8 (previously filed under seal at ECF Nos. 9500-6, -7 and -8).

Certain images contained in these documents have been provisionally redacted, as agreed between the parties, ¹ to obscure the faces of individuals who were minors at the time.

Respectfully submitted,

MOTLEY RICE LLC

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For the Plaintiffs' Executive Committee for Personal Injury and Death Claims on behalf of the Plaintiffs

COZEN O'CONNOR

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For the Plaintiffs' Executive Committee for Commercial Claims on behalf of Plaintiffs

¹ As to ECF No. 9500-4, Plaintiffs have redacted images 1, 4 and 5 on page 11. As to ECF Nos. 9500-6, -7, and -8, Plaintiffs have redacted images at N4 in Annex 7, and at numbers 24, 26 and 27 in Annex 8. All Plaintiffs' provisional redactions (labeled with the code "* ppr") are subject to Plaintiffs' reservation of rights to challenge later. *See* ECF No. 9591.

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Attorneys for Ashton Plaintiffs

cc: The Honorable George B. Daniels, via ECF

All Counsel of Record via ECF